

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

A.G., a minor child; et al.,

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Plaintiffs

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vs.

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Case No: 2:05-CV-1090-MEF

**AUTAUGA COUNTY BOARD OF
EDUCATION, et al.,**

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*

Defendants.

**B.H., a minor child, by and through
his mother and next friend, D.S.**

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Plaintiff,

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vs.

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Case No: 2:06-CV-0393-MEF

**AUTAUGA COUNTY BOARD OF
EDUCATION, et al.,**

*

*

Defendants.

PLAINTIFFS' MOTION IN LIMINE REGARDING DENE CLEVELAND

COME NOW the plaintiffs, by and through counsel, and move for an order in limine precluding the introduction into evidence or the mention of, either by document, testimony, argument of counsel, or otherwise, the following matters:

1. The reason or reasons for the separation of employment between Dene Cleveland and the Autauga County Board of Education.

2. Based on information from defendant's counsel during the course of litigation, it is

believed that a change in the employment status of Dene Cleveland has occurred as a result of medical considerations.

3. That any reasons for an employment change are not relevant and if such change was necessitated for medical reasons such knowledge could engender sympathy for Cleveland and be prejudicial to plaintiffs.

WHEREFORE, premises considered, the plaintiffs submit the motion is due to be granted and that an appropriate order prohibiting such references should be issued.

Respectfully submitted on this the 18th day of May, 2007.

s/Robert D. Drummond, Jr.
Robert D. Drummond, Jr.
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s/Michael J. Crow
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Certificate of Service

I hereby certify that a copy of the foregoing was served electronically on counsel for the defendants, Mark S. Boardman, Esq. and Katherine C. Hortberg, Esq., by filing the same electronically with the Clerk of the Court, United States District Court for the Middle District of Alabama, and Terry Wright, AIS 247561, Limestone Correctional Facility, Dorm 16, 28779 Nick Davis Road, Harvest, AL 35749-7009 by placing a copy of the same in the U.S. Mail postage prepaid and properly addressed on this the 15th day of March, 2007.

s/Robert D. Drummond, Jr.

